

 **Southwestern Bell** Corporation-Washington, Inc. DOCKET FILE COPY ORIGINAL

July 23, 1993

RECEIVED  
JUL 23 1993  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Michael W. Bennett  
Director  
Federal Regulatory

Ms. Kathleen Levitz  
Acting Chief Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 500  
Washington, D.C. 20554

Re: CC Docket No. 92-105 / In the Matter of Use of  
N11 Codes and Other Abbreviated Dialing Arrangements

Dear Ms. Levitz:

Since the pleading cycle in this docket has closed, much activity has occurred in various states regarding the assignment and use of N11 codes. For example, N11 codes have been assigned in Hawaii for hearing impaired services, an investigation is under way regarding the use of an N11 code for hearing impaired services in Canada and many state Commissions--including Texas-- have open dockets addressing the assignment of N11 codes. However, the most troubling action has been the assignment of an N11 code for commercial trial use in both Florida and Georgia.

Southwestern Bell Telephone Company (SWBT) remains strongly opposed to the assignment of N11 codes as proposed in this docket. Contrary to the assertions of some parties, this type of code usage is not in the public interest. SWBT believes that N11 codes should continue to be used for the purposes for which they were originally reserved--public service.

As many parties have commented, N11 codes are a very limited resource and, as such, will exhaust very rapidly if they are assigned for commercial purposes. Indeed, SWBT has already received more requests for N11 codes than it has codes available. Therefore, if ordered by the Commission, any method used for assignment will be controversial. Once these codes have been assigned for commercial purposes, SWBT believes that any potential recall will be very difficult, even if the codes are needed for emergency purposes. Further, SWBT strongly believes that if all of the N11 codes are assigned for commercial purposes, other entities will request a similar access arrangement, through use of other codes, which could have a significant impact on the resources of the North American Numbering Plan (NANP).

1667 K Street, N.W.  
Suite 1000  
Washington, DC 20006

Phone 202 293-8290

EX PARTE OR LATE FILED

Ms. Kathleen Levitz  
Page 2  
July 23, 1993

During the pleading cycle of this proceeding, many parties